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CC Docket No. 94-1

CC Docket No. 93-124

CC Docket No. 93-197

## OPPOSITION OF

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SWBT opposes the Ad Hoc Motion. While the Commission has established an aggressive schedule for the above-referenced dockets, such a schedule is necessary to move on with the process of establishing much-needed pricing flexibility for price cap local exchange carriers (LECs), given the increase in competition. Any relief for the price cap LECs in this docket would likely be delayed by three months were the pleading cycle to be deferred for that time. Ad Hoc does not, nor can it, explain how the competitive injury to the price cap LECs due to outmoded pricing rules will be prevented during a lengthy three-month delay. Therefore, SWBT respectfully requests that the Ad Hoc Motion be denied.

SWBT does support, however, a limited extension of time requested by USTA in this docket separately today.<sup>5</sup> A brief extension in both the Second FNPRM and the Fourth FNPRM, as requested by USTA, would permit more thorough responses to the numerous complex and interrelated issues presented in these parallel proceedings. The Commission should not grant any delay

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<sup>4</sup>(...continued)  
Further Notice of Proposed Rulemaking, (FCC 95-394), (released September 21, 1995) (Third FNPRM).

<sup>5</sup> Opposition to the Motion for Extension of Time of Ad Hoc Telecommunications Users Committee and Motion for Extension of Time of the United States Telephone Association, filed November 8, 1995.

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longer than that requested by USTA because of the compelling need to modernize the current regulatory paradigm to reflect the increasing presence of competition.

Respectfully submitted,

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November 8, 1995

**CERTIFICATE OF SERVICE**

I, Corine D. Duft, hereby certify that the foregoing  
Opposition of Southwestern Bell Telephone Company has been served  
this 8th day of November, 1995 to the Parties of Record.

  
\_\_\_\_\_  
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